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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,

Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

SECOND SUPPLEMENTAL DECLARATION OF JEANNE C. FINEGAN

Pursuant to 28 U.S.C. § 1746, I, Jeanne C. Finegan, hereby declare as follows under penalty
of perjury:

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

I. INTRODUCTION

1. I am a Managing Director and Head of Kroll Notice Media Solutions, an affiliate of Prime Clerk LLC (“**Prime Clerk**”),² the Court-appointed claims and noticing agent in these chapter 11 cases. Except as otherwise noted, this declaration (the “**Declaration**”) is based upon my personal knowledge of the matters set forth herein, my review of relevant documents, information provided to me by Purdue Pharma L.P. (“**PPLP**”) (together, with its debtor affiliates, the “**Debtors**”) and their agents and professionals, including professionals at Davis Polk & Wardwell LLP, and Prime Clerk, and my prior experience in bankruptcy and class action noticing. If called and sworn as a witness, I could and would testify competently thereto.

2. My credentials, expertise, and experience that qualify me to provide an expert opinion and advice regarding notice in these chapter 11 cases include more than thirty (30) years of communications and advertising experience, specifically in the bankruptcy and class action notice context, and are described further in my declaration filed on January 3, 2020, in support of the *Debtors’ Motion for Entry of an Order (I) Establishing Deadlines for Filing Proofs of Claim and Procedures Relating Thereto, (II) Approving the Proof of Claim Forms, and (III) Approving the Form and Matter of Notice Thereof* [Dkt. No. 717]. (Decl. of Jeanne C. Finegan (Jan. 3, 2020), Dkt. No. 719 (the “**Finegan Declaration**”).)

3. I submit this Declaration in support of the *Debtors’ Motion to Approve (I) the Adequacy of Information in the Disclosure Statement, (II) Solicitation and Voting Procedures, (III) Forms of Ballots, Notices and Notice Procedures in Connection Therewith, and (IV) Certain Dates with Respect Thereto* [Dkt. No. 2489] (the “**Disclosure Statement Motion**”).

² Capitalized terms used herein and not otherwise defined shall have the meanings assigned to them in the Disclosure Statement Motion (defined herein) or the *Disclosure Statement for Third Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors* [Dkt. No. 2907].

4. As described in the Finegan Declaration and the *Supplemental Declaration of Jeanne C. Finegan* [Dkt. No. 1179] (the “**Supplemental Finegan Declaration**”), the Debtors’ Supplemental Notice Plan, which provided notice of the Bar Dates to both known and unknown claimants and parties in interest, was one of the largest legal notice programs ever deployed,³ reaching an estimated ninety-five (95) percent of all adults in the United States and its territories⁴ (collectively, the “U.S.”) over the age of eighteen (18)⁵ with an average frequency of message exposure of six (6) times and an estimated eighty (80) percent of all adults in Canada over the age of eighteen (18)⁶ with an average frequency of message exposure of three (3) times. The supplemental confirmation hearing notice plan (the “**Supplemental Confirmation Hearing Notice Plan**”) will capitalize on the above-described notice that has already been provided in these cases. The Supplemental Confirmation Hearing Notice Plan is expected to reach an estimated eighty-four (84) percent of all adults in the U.S. over the age of eighteen (18) with an average frequency of message exposure of three (3) times, and an estimated eighty (80) percent of all adults in Canada over the age of eighteen (18) with an average frequency of message exposure of three (3) times. It will also provide international notice in certain other countries. The estimated cost of the Supplemental Confirmation Hearing Notice Plan is \$8,100,000.

5. This Declaration describes in detail the Debtors’ Supplemental Confirmation Hearing Notice Plan to be implemented in the U.S., Canada, and thirty-nine (39) other countries.

³ See Finegan Decl. ¶ 22.

⁴ The territories include Guam, U.S. Virgin Islands, Marianas, American Samoa, and Puerto Rico.

⁵ Approximately 234,000,000 people in the U.S., regardless of age, gender, or socioeconomic condition.

⁶ Approximately 29,000,000 people in the Canada, regardless of age, gender, or socioeconomic condition.

II. ACTUAL NOTICE

6. As set forth in the Disclosure Statement Motion and the *Second Amended Proposed Order* [Dkt. No. 2913-1], the Debtors are proposing to serve via first-class mail the Confirmation Hearing Notice on all known holders of Claims and Interests, which I am advised includes all known holders of Shareholder Released Claims, all parties known to the Debtors as having potential claims against the Debtors' estates as defined in paragraph 18(i) of the Bar Date Order (excluding those parties who have requested not to receive notice), and the Notice Parties (regardless of whether such parties are entitled to vote on the Plan) prior to the Solicitation Deadline.

III. SUPPLEMENTAL CONFIRMATION HEARING NOTICE IN THE U.S.

7. In the U.S., the Supplemental Confirmation Hearing Notice Plan will employ six primary methods of providing notice: (i) direct mailings to certain individuals and entities (as described above and below), (ii) print media (e.g., magazine and newspaper), (iii) online display (e.g., banner advertising on websites), (iv) internet search terms (e.g., Google); (v) social media campaigns (e.g., Facebook, Instagram, LinkedIn, YouTube, and Twitter), and (vi) earned media (e.g., press releases). Notice will be provided in English and Spanish and is expected to serve approximately 630,000,000 impressions. The estimated cost of implementing the Supplemental Confirmation Hearing Notice Plan in the U.S. is \$3,850,000.

8. The publication version of the Confirmation Hearing Notice (the "**Publication Notice**") will be published one time on or before the Solicitation Deadline in each of the following national newspapers: *The Wall Street Journal*, *The New York Times*, *USA Today*, and *Financial Times (Worldwide edition)*. A plain language summary of the Confirmation Hearing Notice will be published one time on or before the Solicitation Deadline in each of the following magazines:

People Magazine, *People En Español*, *Women's Day*, *Parents*, and *Time Magazine*, and two times on or before the Solicitation Deadline in *Sports Illustrated*. In addition, the *National Geographic*, *Good Housekeeping*, *Men's Health*, and *Parents Latina* websites will be added to a whitelist of sites on which our display ads may appear. Individuals and entities (including prescribers, pharmacies and institutions that received Purdue Opioids, and third-party organizations) that received a summary of the Bar Date Notice, as described in paragraph 6 of the Supplemental Finegan Declaration, and the American Association for Justice, will also receive a plain language summary of the Confirmation Hearing Notice.

9. The digital portion of the Supplemental Confirmation Hearing Notice Plan (online display, internet search terms, and social media) will serve online advertisements in English and Spanish to individuals nationwide with creative messages designed for various demographics that will direct them to the case website for additional information—including information about the Confirmation Hearing. The Supplemental Confirmation Hearing Notice Plan will target fans or followers of specialized social media pages and groups that relate to opioid abuse such as addiction centers, recovery groups, specialized doctors, and national organizations, as well as individuals who use certain search terms on Google.

IV. SUPPLEMENTAL CONFIRMATION HEARING NOTICE IN CANADA

10. In Canada, the Supplemental Confirmation Hearing Notice Plan will employ five primary methods of providing notice: (i) print media (e.g., magazine and newspaper), (ii) online display (e.g., banner advertising on websites), (iii) internet search terms (e.g., Google); (iv) social media campaigns (e.g., Facebook, Instagram, and YouTube), and (v) earned media (e.g., press releases). Notice will be provided in English and French and is expected to serve approximately

93,000,000 impressions. The estimated cost of implementing the Supplemental Confirmation Hearing Notice Plan in Canada is \$634,000.

11. A plain language summary of the Confirmation Hearing Notice will be published one time on or before the Solicitation Deadline in the weekday and Saturday editions of each of the following newspapers: *Globe & Mail*, *National Post*, and *Le Journal Montreal*, and in each of the following magazines: *Chatelaine* (English edition), *Reader's Digest* (both English and French editions), *Maclean's*, *Coup de Pouce*, *L'Actualite*, and *Hello! Canada*. In addition, the *Canadian Geographic*, *Canadian Living*, and *Chatelaine* (French edition) websites will be added to a whitelist of sites on which our display ads may appear.

12. Similar to the digital media that will be used in the U.S., the digital portion of the Supplemental Confirmation Hearing Notice Plan in Canada (online display, internet search terms, and social media) will serve online advertisements in English and French to individuals—targeting fans or followers of specialized social media pages and groups, as well as individuals who use specific search terms on Google, and directing those individuals to the case website for additional information.

V. SUPPLEMENTAL CONFIRMATION HEARING NOTICE IN OTHER COUNTRIES

13. The Supplemental Confirmation Hearing Notice Plan will use advertisements in local newspapers and social media campaigns (e.g., Facebook, Instagram, YouTube, and WeChat) to provide notice to individuals in thirty-nine (39) countries.⁷ The social media advertisements will be similar in scope and form to the advertisements served in the U.S. and Canada. The

⁷ The thirty-nine (39) countries include Germany, England, Scotland, Wales, Northern Ireland, Italy, France, Spain, Switzerland, the Netherlands, Ireland, Belgium, China, South Korea, the Philippines, Malaysia, Hong Kong, Singapore, Brazil, Colombia, Mexico, South Africa, Australia, New Zealand, Denmark, Finland, Iceland, Norway, Sweden, Belarus, Ukraine, Czech Republic, Slovakia, Hungary, Romania, Moldova, Bulgaria, Poland, and Russia.

Supplemental Confirmation Hearing Notice Plan is expected to serve over 744,500,000 social media impressions in these thirty-nine (39) countries and cost approximately \$3,650,000.

14. The Publication Notice will be published one time on or before the Solicitation Deadline in the *International Herald Tribune* and *Financial Times (Worldwide edition)*. A plain language summary of the Confirmation Hearing Notice will be published in approximately eighty-five (85) local newspapers across the thirty-nine (39) countries.

VI. ACTIVE CAMPAIGN MANAGEMENT AND OPTIMIZATIONS

15. We will modify the Supplemental Confirmation Hearing Notice Plan as needed to ensure optimal reach and frequency. Our media team will regularly perform quality control reviews of the Supplemental Confirmation Hearing Notice Plan's implementation to ensure resources are maximized and deployed efficiently and effectively. We will also actively manage and optimize the various media channels, refining the Supplemental Confirmation Hearing Notice Plan and shifting budget toward the media channels and targeting that are delivering the greatest results. Optimizations are determined based on data from attribution sources on Google Analytics and other sources including social and general media tools, such as Cision, among others.


VII. CONCLUSION

16. In my opinion, the Debtors' Supplemental Confirmation Hearing Notice Plan is broad and multifaceted, and will adequately provide notice of the Confirmation Hearing.

[Remainder of page intentionally left blank]

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed: May 24, 2021
Tigard, Oregon


Jeanne C. Finegan